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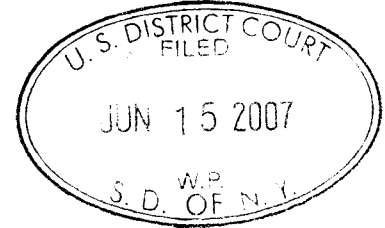
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June 11, 2007



Client No.

P 88497-00016

MEMO ENDORSED

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VIA FIRST CLASS MAIL

Honorable Mark Fox
United States Magistrate Judge
United States District Court, Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: *Shaw Family Archives, Ltd., et al. v. CMG Worldwide, Inc., et al., CMG Worldwide, Inc., et al. v. Bradford Licensing Assocs., Docket No. 05-cv-3939*

Dear Judge Fox:

In accordance with the telephonic status conference held before Your Honor on May 29, 2007, we respectfully submit this letter on behalf of all parties to provide this Court with an agreed-upon case management plan to govern this action. As we discussed with Your Honor during the May 29th call, the parties have agreed to extend the discovery cut-off deadline to November 30, 2007, six months from now. In accordance with that agreement, we submit the following proposed new deadlines:

August 1, 2007 -- last day to amend the pleadings (but not to add additional parties)

October 16, 2007 -- expert disclosures and reports due

November 9, 2007 -- rebuttal expert disclosures and reports due

November 30, 2007 -- close of all fact and expert discovery

January 15, 2008 -- joint pre-trial order due.

MARK D. FOX
United States Magistrate Judge
Southern District of New York

A handwritten signature in dark ink, appearing to read "Mark D. Fox", written over a horizontal line.

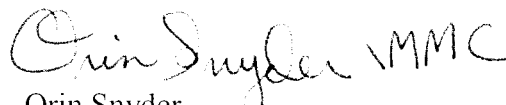
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Honorable Mark Fox
June 11, 2007
Page 2

We thank the Court for its kind consideration of this request.

Respectfully,


Orin Snyder

CSA/ks

cc: Christopher Serbagi
Jonathan Polak

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